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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.,¹

Reorganized Debtor.

)
) Chapter 11
)
) Case No. 19-34054-sgj11
)
)
)
)

STIPULATION FURTHER AMENDING RESPONSE DATE

¹ The Reorganized Debtor's last four digits of its taxpayer identification number are (8357). The headquarters and service address for the Reorganized Debtor is 100 Crescent Court, Suite 1850, Dallas, TX 75201.

This stipulation (the “Stipulation”) is made and entered into by and between Highland Capital Management, L.P., the reorganized debtor in the above-captioned proceeding (“Highland”), and Todd Travers (“Claimant,” and together with Highland, the “Parties”), by and through their respective undersigned counsel.

RECITALS

WHEREAS, on October 16, 2019 (the “Petition Date”), Highland commenced a voluntary case under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware. On December 4, 2019, the Delaware Court entered an order transferring venue of Highland’s bankruptcy case to this Court [Docket No. 186].

WHEREAS, on May 11, 2020, Claimant filed Proof of Claim No. 180 (“Claim 180”).

WHEREAS, on December 18, 2020, Claimant filed Proof of Claim No. 202 (“Claim 202,” and together with Claim 180, the “Claims”), which superseded and replaced Claim 180 in its entirety.

WHEREAS, on June 10, 2022, Claimant filed the *Motion to Confirm Timeliness of Filed Claim, or Alternatively, to Allow Late-Filed Proof of Claim Filed by Todd Travers* [Docket No. 3360] (the “Motion”).

WHEREAS, the Motion was filed on negative notice and all responses to the Motion were required to be filed on or before July 5, 2022 (the “Response Date”).

WHEREAS, in order to facilitate a potential resolution of the Claims and, to avoid the cost and expense of briefing the Motion, the Parties, on June 13, 2022, executed and filed with this Court that certain *Stipulation Amending Response Date* [Docket No. 3361] (the “Initial Stipulation”) in which they agreed to extend the Response Date to 5:00 p.m. Central Time on August 1, 2022 (the “Amended Response Date”).

WHEREAS, this Court entered an order approving the Initial Stipulation on June 21, 2022

[Docket No. 3369] and extended the Response Date to the Amended Response Date.

WHEREAS, the Parties continue to discuss a potential resolution of the Claims and, to avoid the cost and expense of briefing the Motion, have agreed to extend the Amended Response Date to 5:00 p.m. Central Time on August 22, 2022.

NOW, THEREFORE, it is hereby stipulated and agreed, and upon approval of this Stipulation by the Court, it shall be SO ORDERED:

1. The Amended Response Date will be extended to 5:00 p.m. Central Time on August 22, 2022.

2. The Court shall retain jurisdiction over all disputes arising out of or otherwise concerning the interpretation and enforcement of this Stipulation.

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Dated: July 21, 2022

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